

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO**

In re:

Suzanne Bair,

Debtor.

Chapter 7

Case No. 1:18-bk-12585

Judge Jeffery P. Hopkins

Barestone, LLC, et al.

Plaintiffs

v.

Suzanne Bair,

Defendant-Debtor.

ADV. PRO. NO. 1:18-ap-01062

NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

PLEASE TAKE NOTICE that the undersigned appears as counsel in this adversary matter only (Robert A. Goering, Esq. will remain counsel for debtor in the underlying bankruptcy Case No. 1:18-bk-12585) for debtor Suzanne Bair (“Debtor”) and herewith demands that all notices given or required to be given in this case be served upon the undersigned at the following address and telephone number:

Paul T. Saba, Esq.
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2623 Erie Avenue
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Pursuant to Rule 2002(g) of the Federal Rules of Bankruptcy Procedure, and as contemplated by Sections 1109(b) and 102(1) of the Bankruptcy Code, the foregoing demand includes not only the notices referred to in the Rule and statutes specified above, but also includes, without limitation, notices of any application, motion, or other pleading, whether formal or informal, whether written or oral, and whether transmitted by mail, hand delivery, telephone, or facsimile: (1) that affects or seeks to affect in any way rights or interests of (a) the Debtor, (b) property in which the Debtor may claim an interest, (c) property in the possession, custody or control of the Debtor, or (d) claims against the Debtor or the estate; (2) that seeks to require any act, payment, or other conduct by; or (3) that in any manner affect the rights of Debtor.

PLEASE TAKE FURTHER NOTICE that Debtor intends that neither this notice of appearance nor any later appearance, pleading, claim or suit shall waive: (1) the rights of Debtor to have final orders in non-core matters entered only after de novo review by a District Judge; (2) the rights of Debtor to a trial by jury in any proceeding so triable in this case; (3) the right of Debtor to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) any other rights, claims, actions, defenses, setoffs, or recoupments to which Debtor is or may be entitled, under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments Debtor expressly reserves.

Dated: November 15, 2018

Respectfully submitted,

/s/ Paul T. Saba

Paul T. Saba, Esq. (0063723)

Jeffrey M. Nye, Esq. (0082247)

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Attorneys for Debtor

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice of Appearance and Demand for Service of Papers was served on November 15, 2018 upon the U.S. Trustee and on all registered ECF

Participants, electronically through the court's ECF System at the email address registered with the Court:

U.S. Trustee

Henry E. Menniger, Jr., U.S. Trustee

Robert A. Goering, Attorney for Robert A. Goering

Brian R. Redden, Attorney for Plaintiffs

/s/ Paul T. Saba

Paul T. Saba, Esq. (0063723)